



Leonard J. Cali
Vice President – Law
& Director of Federal Government Affairs

Suite 1000
1120 20th Street, NW
Washington DC 20036
202-457-2120
FAX 202-457-3205

January 28, 2003

Via Electronic Filing
Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TWB-204
Washington, DC 20554

Re: In the Matter of Review of Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers and Implementation of the Local Competition Provisions in the Local Telecommunications Act of 1996; CC Docket Nos. 01-338, 96-98, 98-147

In the Matter of Appropriate Framework for Broadband Access to the Internet Over Wireline Facilities, CC Docket Nos. 02-33, 95-20, 98-10

Dear Ms. Dortch:

Yesterday and earlier today, in conversations with Jordan Goldstein, Senior Legal Advisor to Commissioner Michael J. Copps, I discussed matters related to the referenced proceedings. In particular, I discussed the important role of the states in fostering competition in local markets, the central role that the states should play in any determination to "de-list" UNEs, and AT&T's views concerning preemption of the states. I also emphasized that the record in the Triennial Review proceeding demonstrates continuing operational and economic impairments concerning UNEs, as set forth in AT&T's written submissions. In particular, I underscored that UNE-P is today essential for competition in the provision of local telecommunications services to residential and small business customers, and that loop access and provisioning difficulties along with loop, collocation, transport, and related costs continue to preclude the deployment of competitive switches. I also discussed AT&T's concerns with transport and loop UNEs and UNE use restrictions, as set forth in AT&T's written submissions. In addition, I

underscored the importance of preserving CLEC access to ILEC loop facilities, and identified operational and cost barriers to competition that would result if CLECs were relegated to copper facilities as ILECs introduce additional fiber into existing loop plant. My comments were consistent with AT&T's written submissions in the reference proceedings.

One electronic copy of this Notice is being submitted for the referenced proceedings in accordance with the Commission's rules.

Sincerely,

A handwritten signature in dark ink, appearing to read "A. J. Cal". The signature is stylized with a large, sweeping initial "A" and a distinct "J" and "Cal" following it.

cc: J. Goldstein